

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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U.S. DISTRICT COURT
DISTRICT OF MASS.

RUSSELL F. SHEEHAN, as he is ADMINISTRATOR,
ELECTRICAL WORKERS' HEALTH AND
WELFARE FUND, LOCAL 103, I.B.E.W.;
ELECTRICAL WORKERS' PENSION FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
SUPPLEMENTARY HEALTH AND WELFARE
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' DEFERRED INCOME FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
JOINT APPRENTICESHIP AND TRAINING
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' EDUCATIONAL AND CULTURAL
FUND; ANTHONY J. SALAMONE, as he is
ADMINISTRATOR, NATIONAL ELECTRICAL
BENEFIT FUND; and LOCAL 103, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS,

Plaintiffs

vs.

THIBAUT CONTROLS, LLC,
Defendant

and

FLEET BANK,
Trustee

C.A. No. 04-10282 RGS

**PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST THIBAUT CONTROLS, LLC**

Now come the Plaintiffs (hereinafter, the "Funds"), and request the Clerk, pursuant to Rule 55(b)(1), Fed.R.Civ.P., to enter default judgment in favor of the Funds and against Defendant Thibault Controls, LLC (hereinafter "Thibault"), holding Thibault liable for all unpaid

contributions owed to the Funds, together with interest, statutory liquidated damages, and reasonable attorneys' fees and costs as follows:

A.	Principal owed to the Funds through October, 2003	\$51,496.22
B.	Prejudgment interest on late paid and unpaid contributions, as mandated by 29 U.S.C. § 1132(g)(2)(B), if all unpaid contributions were paid by the end of July, 2004	\$8,343.58
C.	Liquidated damages as mandated by 29 U.S.C. §1132(g)(2)(C)(i)	\$3,794.41
D.	Attorneys' Fees as mandated by §1132(g)(2)(D)	\$1,424.50
E.	Costs	\$358.61
	TOTAL	\$65,417.32

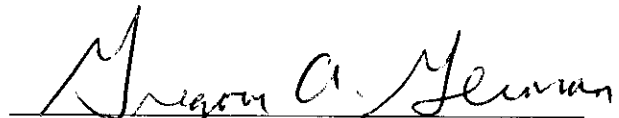
As grounds therefore, Plaintiffs state that default has been entered against Defendant for failure to answer or otherwise defend as to the Complaint of the Plaintiffs. Plaintiffs' claim is for a sum certain. Finally, Defendant is neither an infant nor an incompetent person.

WHEREFORE, Plaintiffs respectfully request that default judgment be entered against Thibault Controls, LLC.

Respectfully submitted,

RUSSELL F. SHEEHAN, as he is
ADMINISTRATOR, ELECTRICAL
WORKERS' HEALTH AND WELFARE
FUND, LOCAL 103, et al,

By their attorneys,



Anne R. Sills, Esquire

BBO #546576

Gregory A. Geiman, Esquire

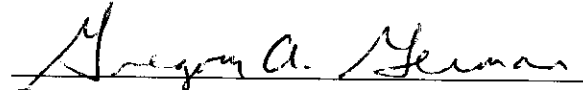
BBO #655207

Segal, Roitman & Coleman
11 Beacon Street
Suite #500
Boston, MA 02108
(617) 742-0208

Dated: July 22, 2004

CERTIFICATE OF SERVICE

This is to certify that a copy of the above Plaintiffs' Motion for Entry of Default Judgment Against Thibault Controls, LLC has been served by first class mail upon Thibault Controls, LLC c/o John Leboe, Esquire at 6 Loudon Road, Concord, NH 03110 this 22 day of July, 2004.



Gregory A. Geiman, Esquire